Appendix A–Scoping Comments Summary

Introduction

The Forest Service, U.S. Department of Agriculture, Allegheny National Forest, Marienville Ranger District, is proposing to implement the Otter project. This project includes vegetation management, wildlife and aquatic habitat improvements, non-native invasive plant species treatments, and road construction, reconstruction, decommissioning, and maintenance within the 12,052-acre project area. This report summarizes the scoping process for the Otter project and presents analyses of comments received from the public.

The scoping period began on December 21, 2018 when the scoping package was mailed to interested individuals and organizations, including adjacent landowners, special use permittees, and subsurface mineral owners. On December 21, 2018, a news release was sent to local media. The scoping package was also posted on the Allegheny National Forest website on December 21, 2018. The Otter project was listed in the Allegheny National Forest schedule of proposed actions (SOPA) starting with the January 2019 issue. The scoping comment period for this project ended on January 22, 2019. Thank you to the three individuals (listed below) who submitted comments.

- Dick Artley
- Richard Mauk
- Pauline Steinmeyer

The respondents' comments are included in the project file. The sections below summarize the content analysis of the public scoping comments for the Otter project.

I. Issues

A. Unresolved and Resolved Issues

Unresolved Issues

Unresolved issues are used to formulate alternatives, prescribe mitigation measures, or analyze environmental effects. Issues are "unresolved" because of the extent of their geographic distribution, the duration of their effects, or the intensity of interest or resource conflict.

Indicator Measures for Unresolved Issues

None. No unresolved issues were identified by the responsible official or the interdisciplinary team.

Resolved Issues

These are issues which are not used in the environmental analysis. A reason must be cited. Reasons may include:

- The issue is outside the scope of the proposed action.
- The issue is already decided by law, regulation, Forest Plan, or other higher level decision.
- The issue is irrelevant to the decision to be made.
- The issue is conjectural and not supported by factual evidence.

Comment 1 – Potential Old Growth Stands

The Otter Vegetation Management Project (OVMP) cites the LRMP page 115 where areas of old growth potential are to be reevaluated and adjusted during project planning. Three of seven stands in MA 3.0 within the OVMP are proposed for regeneration. This accounts for 47% of the potential old growth stands. I know of no project since the LRMP was adopted where the reevaluation and adjustment ***increased*** the number of potential old growth stands. Old growth, unroaded areas, and primitive recreation continue to be encroached upon in this and every project at the expense of "forest health" and "age class diversity".

Opportunity: In the 7000 acres of MA 3.0 in this project there is an opportunity to designate 78 acres for potential old growth to replace the three stands lost. These acres should be selected from stands with current age class above 110 years. (**Mauk)**

Response: *According to Forest Plan standard and guidelines on page 115 for Management Area 3.0, "A set of currently identified and mapped potential old growth areas shall be maintained. These areas may be reevaluated and adjusted during project planning." A review of the GIS layer for the mapped potential old growth stands shows that seven previously designated potential old growth stands are located in Management Area 3.0 in the Otter project area. Three of the stands are proposed for silvicultural treatments in the Otter project. The table below shows the stand type, acres, age, and predominate tree species of these stands. Field surveys indicate that hemlock is present in the stands to some degree, with stand 885024 containing the most per acre. Sugar maple is a component of two of the three stands. There are no outstanding old growth attributes in these three stands and their attributes compare with many of the stands in the project area. Potential old growth characteristics (larger diameter trees, large wood on the forest floor, snag and den trees, and multi-layered stand structure) can be found in many stands located in Management Area 2.2 (5,130 acres) in the project area. One hundred thirty-eight (138) acres (2.7 percent) of Management Area 2.2 are proposed for stand treatment in the Otter project. The proposed stand treatments in MA 2.2 are intended to meet late-structural habitat conditions to grow large diverse trees, create horizontal and vertical diversity, and mimic gap phase conditions. Other proposed treatment areas may have reserve areas designated that conserve old growth characteristics, such as large trees, boulders, large wood debris, and other unique habitats. Based on this evaluation, there are adequate areas of potential old growth and areas with old growth characteristics within the project area to provide potential old growth into the future.*

Habitat data for potential old growth stands in Otter project proposed for timber harvest

Stand	Acres	Age Class	Forest Type	Species/Percent		
871073	29	101-110	Allegheny hardwoods	Black cherry/48	Sugar maple/27	Red maple/23
871049	37	81-90	Mixed upland hardwoods	Black cherry/59	Sugar maple/21	American beech/9
885024	10	101-110	Mixed upland hardwoods	Red maple/42	Black cherry/26	Eastern hemlock/13

Comment 2 – Unroaded Areas

Map 1 (Existing Conditions), identifies two unroaded areas within the OVM Project boundaries. They are the Rocky Run and Bloody Run unroaded areas. Between the proposed Transportation Management and Silviculture Treatments, the Bloody Run unroaded area will cease to exist. The realignment and extension of FR 135C completely eliminates this unroaded area. The silviculture treatments lay waste to the "inherent characteristics associated with its roadless condition". (FWRAP, 2003 p .24) The 222 acres *temporary* opening 135C North lies within the boundaries of the Bloody Run unroaded area.

Opportunity: There is an opportunity to greatly increase the recreational, wildlife, and aquatic index of the Bloody Run unroaded area. The decommissioning of FR 237B would double or triple the size of the area. Otter Run would be included. Only four silviculture treatment stands would be eliminated (86 acres). FR237B would no longer be needed for future management as the area would be unroaded. In addition, the extension of FR 135C and the eleven stands of 135C North need to be eliminated.

Response: *The 2003 Forest-wide Roads Transportation Analysis Process report identified unroaded areas, these areas were considered during Forest Plan revision, and whether to maintain them as unroaded or more actively manage them was determined through the assignment of management areas. As a result, the role this unroaded area is expected to play from a larger, landscape-level perspective has been decided.*

An analysis of remote habitats (unroaded areas) was conducted in the Final Environmental Impact Statement for the Forest Plan (pages 3-227 to 3-228 and 3-266) on a forest-wide scale and 88 percent of the highest quality remote habitat and 60 percent of the quality remote habitat are in management areas that contain Forest Plan direction compatible with sustaining these remote habitats.

On a landscape scale, the Allegheny National Forest Plan has designated:

- *Management Area 2.1 emphasizing mature forest structural changes and complex forest structure.*
- *Management Area 2.2 providing late structural habitat.*
- *Management Area 5.1 providing wilderness areas emphasizing undisturbed landscapes.*
- *Management Area 5.2 providing relatively undisturbed landscapes.*
- *Management Area 6.1 providing late structural forest conditions.*
- *Management Area 7.2 providing remote recreation areas where mature forest provides habitat for wildlife sensitive to human disturbance.*
- *Management Area 8.1 provides a wild and scenic river corridor along the Allegheny and Clarion Rivers where vegetation management will occur only to benefit recreation opportunities and/or wildlife.*
- *Management Area 8.2-National Recreation Area provides a continuous forest canopy dominated by mature and old forest.*
- *Management Area 8.3 provides a remnant of late structural forest.*
- *Management Area 8.5 is set aside to study natural ecological processes, which require the Forest Service to favor and protect mature forest conditions.*

These areas total 204,494 acres or nearly 40 percent of the Allegheny National Forest. Because many of these management areas are geographically linked together, wildlife and plant species that require or prefer mature forest habitat are provided for on a broad-scale.

On the project level, the Forest Plan requires that management activities developed strive to meet the goals and objectives of the affected management area. In Management Area 3.0–Even-aged Management (6,922 acres), a primary goal is to provide a mix of different age and size classes of forest vegetation on a sustainable level. Not all wildlife and plant species thrive in mature forest, and Management Area 3.0 provides habitats in various stages of forest structure to meet the needs of game and non-game species that use a variety of habitat conditions including early to mid-structural forest.

The environmental analysis examined the effects of the proposed activities in respect to direct and indirect effects, as well as past, present, and foreseeable future effects of activities on National Forest System lands and private holdings within and adjacent to the project area. The patch (habitat fragmentation) analysis for the project examined the effects of the proposed activities regarding patch size of mature forest, vegetative corridors linking common habitat types and matrix or arrangement of patches across the landscape.

As outlined in the 2003 FWRAP, unroaded areas provide a valuable function socially and ecologically. Elimination of less than one mile of road (FR 237B), 300 acres of silviculture, and cancelling 0.8 miles of new road construction will have a tremendous effect on the unroaded areas of the Allegheny National Forest.

Response: *Forest road 237B is needed for future management of the Allegheny National Forest and for access by private oil and gas developments. However, after considering your comments, we modified the proposed action to include decommissioning of the 0.7 mile of non-system road NS030195 extending south just beyond the utility corridor at the end of forest road 237B. This road is substandard, is not currently*

needed for long-term management or for private oil and gas access, and is impacted heavily by illegal off-road vehicle use.

I am not aware of the creation nor expansion of any unroaded area in any project since the 2003 FWRAP. I am aware of too many examples of roads built into them, reducing their size and nature. If the Allegheny National Forest is a Land of Many Uses, there is a need for the preservation and possible expansion of these valuable areas. The Otter Vegetation Management Project provides an opportunity to meet this need.

Response: *A key element in our analysis of vegetation management and transportation activities during my tenure as the Marienville District Ranger has been the effect on unroaded areas, and specifically a concern regarding the proliferation of roads, both classified and unclassified, on National Forest System lands within the Marienville Ranger District. Listed below is a summary of vegetation management decisions on the Marienville Ranger District since 2007 that have unroaded areas within the project areas and the changes that occurred to their size and shape from proposed activities.*

- ***Chaffee project:*** *Developed so that proposed activities did not affect the size or shape of Crane Run (#13) unroaded area.*
- ***Salmon East project:*** *Penoke Run (#24) unroaded area planned to increase slightly in size by about 4.3 acres due to proposed road decommissioning.*
- ***Salmon West project:*** *Two Mile Run (#53) unroaded area planned to increase in size by approximately 86 acres due to proposed road decommissioning.*
- ***Millsteck project:*** *Gurgling Run (#22) unroaded area planned to be reduced in size by approximately 148 acres due to proposed road construction. No changes to the size and shape of the other three unroaded areas (Steck Run [#12], Muddy Fork [#36], and Gregg Hill [#37]) within the project area with implementation of the proposed activities.*
- ***Pine Bear project:*** *The no new roads alternative was selected, retaining the current size and shape of the Pine Run (#40) and Twin Lick (#62) unroaded areas located in the project area. However, proposed road construction in the Pine Bear Supplemental Environmental Assessment Decision Notice was necessary for access to address forest health concerns and will reduce the size of the Pine Run (#40) unroaded area by about 30 acres.*
- ***DeYoung project:*** *Approximately 128 acres of the Hunter Creek (#39) unroaded area lies within the De Young project area; none of the proposed activities will change the size or shape of this unroaded area.*
- ***North End project:*** *The no new roads alternative was selected retaining the current size and shape of the South Branch West (#44) and South Branch East (#63) unroaded areas located in the project area.*
- ***South Branch Kinzua Creek project:*** *The South Branch Kinzua West (#44) unroaded area planned to increase in size due to the proposed decommissioning of forest road 463B; and the size and shape of the South Branch Kinzua East (# 63) unroaded area will not change with implementation of the proposed activities.*
- ***Brush Creek project:*** *The Lick Run (#25) unroaded area planned to be reduced in size from approximately 1098 acres to 667 acres. The size and shape of the two remaining unroaded areas, McRay Run (#16) and West Branch Millstone (#55), will not change with implementation of the proposed activities (the selected alternative was modified by responsible official to reduce the effects to these two unroaded areas).*

In considering these comments, the interdisciplinary team updated the size and shape of the unroaded areas within the project area by incorporating recent changes in oil and gas developments, and by reevaluating some roads previously characterized as classified roads. This resulted in the Bloody Run unroaded area

increasing in size from 598 acres to 784 acres, and also resulted in a new unroaded area greater than 500 acres (527 acres) east of and along Otter Run due to the reclassification of roads previously characterized as classified roads (see Figure 1 below).

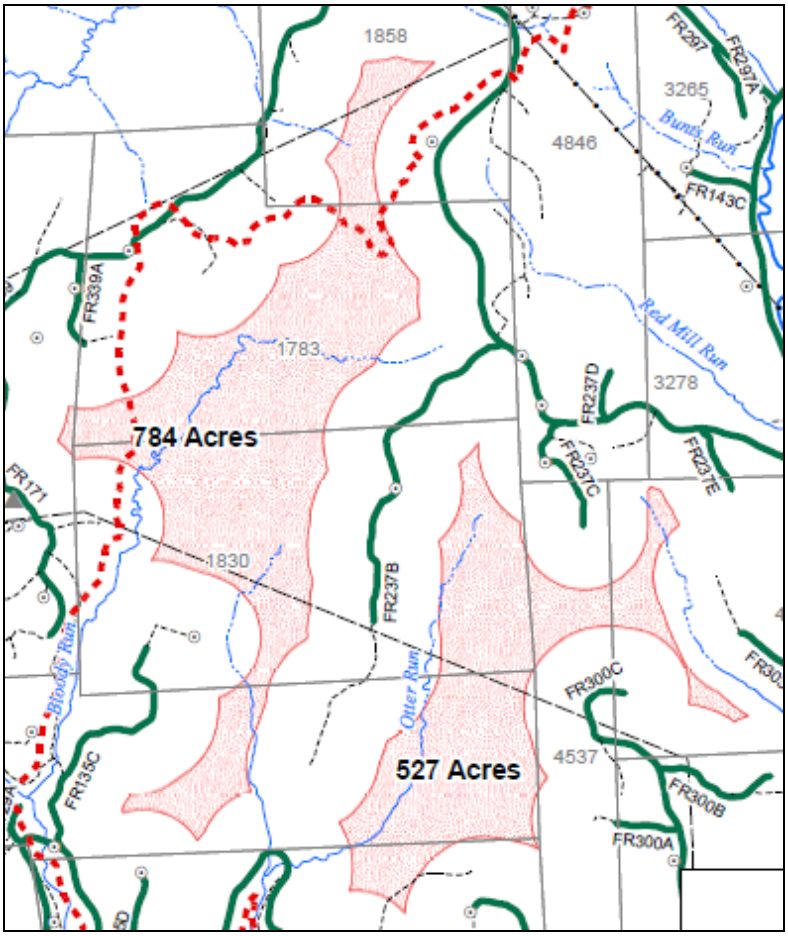

Figure 1. Revised unroaded areas – Existing condition

I am bewildered by this cavalier approach to unroaded area management. I understand that these projects are planned by a multi-disciplinary team. Where are the benefits of unroaded areas weighed against the forest health (value of the timber) in them?

According to the 2003 FWRAP, an unroaded area is described as:

> Any area without the presence of a classified road that is of a size and configuration sufficient to protect the inherent characteristics associated with its roadless condition. Unroaded areas . . . may serve many of the ecological functions and possess the same social values as those associated with IRA's.
>
> **Social values** may include one or more of the following:
>
> • Provide a unique opportunity for dispersed recreation;
> • Provide sources of clean drinking water;
> • Provide a large, undisturbed landscape that offers privacy and seclusion;
> • Provide an opportunity for study, research and education.
>
> **Ecological functions** that an unroaded area may possess:

- Support a diversity of habitat for native plants and animals;
- Conserve an area's biodiversity by:

  a. Providing large, relatively undisturbed blocks of habitat;
  b. Functioning as biological strongholds and refuges for a number of species. (FWRAP pp26-27.

Further:

> Fewer open roads and more unroaded areas are desired for a variety of recreation activities. Public comments received stated that, "unroaded areas greater than 500 acres should be identified and given immediate protection". (FWRAP, p. 43)

The Bloody Run unroaded area scores a 5 on both unique habitat and E, T, S, species criteria. Its wildlife index of 19 is limited primarily by its size and configuration. **(Mauk)**

> ***Response:*** *We respectfully disagree with the characterization of "… this cavalier approach to unroaded area management."*
>
> *We gave careful consideration to the commenter's concerns regarding forest road 135C and the stands accessed by the proposed extension of this road. The location of this road is problematic – there is a steep segment parallel to Bloody Run that is prone to erosion, is difficult to maintain in a sustainable condition, and is accessible only to high clearance vehicles. This road is needed for access to private oil and gas development below and above this steep segment, but not along the steep segment. The proposed action would maintain the segment from forest road 135 to the steep segment of forest road 135C, decommission the steep segment of forest road 135C, and develop an extension of forest road 135D to connect with forest road 135C above the steep segment, providing access to the private oil and gas development above the steep segment.*
>
> *Regarding the proposed extension of forest road 135C into the existing Bloody Run unroaded area, we believe the forest health concerns in the stands accessed by this extension will have as much or more impact on the social values and ecological function as the extension of the road. We agree that unroaded areas provide unique recreational opportunities, wildlife habitat, and conservation of biodiversity and water quality. In the Otter project area, forest health concerns are prevalent and tangible. Our proposed action is focused on sustained ecosystem and watershed health, and not specifically on timber value. Glossy buckthorn and other non-native invasive plant species are firmly entrenched within the project area. Crown die-back in black cherry trees, the predominant tree species throughout the project area, is extensive and we need to take advantage of a small window for regenerating new healthy stands. The loss of ash and mature beech limits options for species diversity within the project area. We have carefully considered the need for new and existing roads to provide long term access to the proposed stands, and we believe the transportation network we have proposed is necessary to tend these stands from their current declining condition to healthy, diverse, well-functioning native forest stands in the future. Ignoring these challenges today only complicates forest management in the future and reduces the quality of recreation, wildlife habitat, species diversity, and opportunities for conservation of natural resources.*
>
> *By implementing the proposed activities noted above (including the decommissioning of forest road 303 and non-system road NS030195 at the end of forest road 237B), the remaining portion of the Bloody Run unroaded area would become part of a larger 1,505 acre unroaded area (see Figure 2 below); and, overall, the unroaded area within the Otter project area would increase from 1,603 acres in the Forest-wide Road Analysis Process report to 2,510 acres in the proposed action, even with the extension and realignment of forest roads 135C and 135D. Note that forest roads 135C and 135D are already managed as closed roads,*

so once the proposed road construction extending or realigning these roads is completed, the opportunities for solitude will be similar to what exists now.

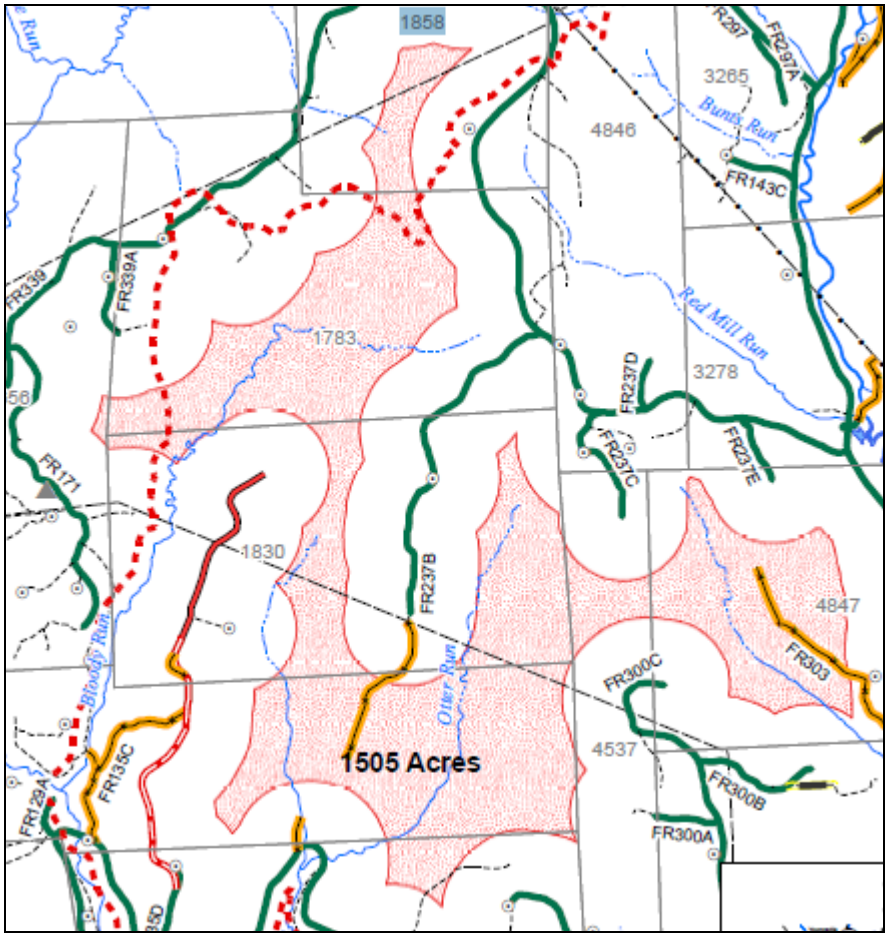

Figure 2. Unroaded areas – Proposed action

Comment 3-Glyphosate
Your Proposed Action might Kill Someone. Aren't you or your IDT Members even a Little Concerned?

You indicate you plan to apply glyphosate as part of your Proposed Action. Your scoping document at page 21 says:

> "Herbicide treatment would include the use of glyphosate, sulfometuron methyl, or both, and would be applied in accordance with Forest Plan standards and guidelines using several different application methods that would remove the invasive plant species and protect native plant species."

When was the ROD for your forest Plan signed? Much of the new science that proves glyphosate exposure can be lethal has been published in the last 5 years. You might kill your human visitors. How would you feel of your doctor said you have cancer? For sure you will kill the wildlife you propose the help with this project.

There are other effective alternatives to glyphosate!!!!!!!!!!!!!!!!!!!

Please assure that the pending draft NEPA document bases the herbicide toxicity and safety disclosures on best science supported by a variety of scientific research conclusions … not the single lab (SERA) hired by Monsanto to do the so-called safety testing. There are hundreds of conclusions from research conducted by

independent scientists that **all** (emphasis added) show glyphosate is a highly-toxic carcinogen. Some of the independent science conclusions can be examined in the **Glyphosate kills Scientific Attachment.**

If after reading the attachment your pre-decisional EA still proposes to spew the poison it will be necessary to warn the people who use the Marienville RD for recreation. You won't like the responses you get from the public after my letter is published in the *Warren Times Observer* and the *Bradford Era*.

What type of people would apply a carcinogenic chemical on public land where children might play? There are several equally effective alternatives to achieve your goal without using a herbicide that contains the poison glyphosate.

Several weeks ago, Dewayne Johnson (a former school groundskeeper) who was diagnosed with lethal non-Hodgkin's lymphoma sued Monsanto alleging the chemical glyphosate (an ingredient in Roundup).caused his cancer. Mr. Johnson used Roundup as part of his job. On August 10, 2018 a jury in San Francisco delivered a verdict in Mr. Johnson's favor. The judge ordered Monsanto to pay Mr. Johnson $289 million in total damages

Unless your final EA or EIS states herbicides containing glyphosate will **not** be applied its likely you will be the next defendant in a court of law Ranger Fallon.

Here's 1 of the many links to the Johnson verdict available online: The public knows.

> **San Francisco Jurors Hear Hours of Scientific Data About Herbicide's Link to Cancer**
>
> https://www.law.com/therecorder/2018/07/09/san-francisco-jurors-hear-hours-of-scientific-data-about-herbicides-link-to-cancer/?slreturn=20180713081135

No caring, sane person would risk another person's life to please their employer. Decades of scientific research conclusions from around the world conclusively show glyphosate exposure has been known to cause DNA damage, autism, irreparable kidney and liver damage, infertility, learning disabilities, ADHD and other neurological disorders (especially in children), mitochondrial damage, cell asphyxia, endocrine disruption, bipolar disorder, skin tumors, thyroid damage, decrease in the sperm count, chromosomal damage and birth defects.

… Once again I ask you to assure your upcoming pre-decisional EA or DEIS states "herbicides containing glyphosate will **not** be applied anywhere at any time. **(Artley)**

> ***Response:*** *The record of decision for the 2007 Allegheny National Forest Land and Resource Management Plan was signed in 2007.*
>
> *Public interest groups have raised concerns about reported detections of glyphosate in food products and in the environment. Many of these reports used screening techniques to analyze for glyphosate and they did not perform analyses that are needed to confirm the results. These reports have furthered public concerns about potential glyphosate impacts on health and the environment.*
>
> *The Forest Service Human Health and Ecological Risk Assessment for Glyphosate, and the Environmental Protection Agency Scientific Advisory Panel on Glyphosate are the state of the art and science in this country. The United States Department of Agriculture supports the science based risk assessments conducted by Environmental Protection Agency.*
>
> *The Environmental Protection Agency registration review of glyphosate was initiated in 2009 (Regulations.gov Docket ID EPA-HQ-OPP-2009-0361). The Environmental Protection Agency released its assessment of the carcinogenic potential of glyphosate in a September 2016 Issue Paper, which concluded that glyphosate is "not likely to be carcinogenic to humans." The Environmental Protection Agency*

convened The Federal Insecticide, Fungicide, and Rodenticide Act Scientific Advisory Panel to evaluate the carcinogenic potential of glyphosate on December 13-16, 2016. The United States Department of Agriculture provided public comment at the scientific advisory panel strongly agreeing with Environmental Protection Agency's conclusions and expressing support for Environmental Protection Agency's underlying weight-of-evidence analysis.

The Environmental Protection Agency subsequently released the draft human health and ecological risk assessments for glyphosate on February 28, 2018 including an updated cancer risk assessment for public comment. The United States Department of Agriculture provided public comments that identified minor concerns, but overall, were supportive of Environmental Protection Agency's assessments. The Environmental Protection Agency again concluded that glyphosate is not likely to be carcinogenic to humans. In addition, the agency found no other meaningful risks to human health when glyphosate is used according to label instructions. These findings are consistent with the conclusions of science reviews conducted by regulatory bodies such as the European Food Safety Agency, the German Federal Institute for Risk Assessment, and the Canadian Pest Management Regulatory Agency, among several others. The preliminary ecological risk assessment suggests risks to non-target plants as well as birds and mammals.

World Health Organization International Agency for Research on Cancer designated glyphosate as a probable human carcinogen in March 2015. The central flaw in International Agency for Research on Cancer's assessment is that it is not risk-based, and does not consider the conditions and levels of exposure to glyphosate that humans will actually experience. As a result of this designation, the state of California has proposed to require all products to be labeled as "a chemical known to the state of California to cause cancer" under Proposition 65. The decision has been challenged in court by agricultural groups. On February 26, 2018, a federal judge temporarily barred California environmental officials from requiring this labeling on food products containing traces of glyphosate.

In summary, the Forest Service will continue to use the science that has been outlined in the Forest Service Health and Ecological Risk Assessment for Glyphosate as well as the Environmental Protection Agency Scientific Advisory Panel findings on glyphosate. For this project, glyphosate would be used in a manner that is consistent with label requirements to address risks to human health and will follow Forest Plan standards and guidelines found on pages 54 through 59.

Comment 4 - Temporary openings greater than 40 acres in size.

I feel compelled to note that there are block sizes which include an opening of over 283 acres, an opening of 260 acres, and an opening of 222 acres along with the several other openings of significant size that are being proposed for this project. This may not include the unidentified acreage of those blocks over 40 acres in size that have been previously approved but will be harvested in this project area. The number of those blocks is not insignificant and may add even more acreage to the already identified 1,535 acres **(Steinmeyer)**.

Response: *Effects of the proposed temporary openings over 40 acres in size were analyzed and considered in the environmental assessment. Please see the response to non-issue 9 below for further discussion regarding this comment.*

Comment 5 - Air quality and Carbon Sequestration

While the effects of removing over 1,535 acres of vegetation includes the tree canopy leaving many large openings described as "temporary". I think it tends to be forgotten that it takes longer than 7-20 years to replace the carbon storage capacity and pollution removing function of the trees being removed. It states on page 12 of the Otter Vegetation Management Project Scoping Document, "Our analysis will examine the effects to vegetation and other resources from the proposed temporary openings greater than 40 acres." I am hoping to read in the completed environmental analysis a section addressing air quality as a resource and human health as well as forest health given consideration when examining the effects of the proposed temporary openings greater than 40 acres on the forest ecosystem and on the surrounding communities. I also hope to find in the completed environmental analysis a plan for remedial actions that will be taken to restore the lost carbon

sequestration and pollution reduction capacity currently provided by Allegheny National Forest and will be lost if the project as currently proposed is implemented **(Steinmeyer)**.

***Response**: Potential effects to air quality from proposed activities, including timber harvest activities, have been analyzed and considered in the environmental assessment. Effects to air quality show that project activities are below the threshold of concern when protecting air quality.*

The effects of the project level treatments are not discernible at the level of global climate because of the many intervening variables that are outside the control of the Forest Service at the project level. A report that estimates baseline carbon stocks in forests and harvested wood products for National Forest system units (USDA-FS 2015) determined that total forest ecosystem carbon (in all seven pools) stored in the Eastern Region slowly increased rapidly between 2005 and 2013. The Allegheny National Forest is specifically mentioned as a unit in which total forest ecosystem carbon increased during that time. Forest management that generates long-lived wood products, such as lumber and furniture, transfer ecosystem carbon to the harvested wood products pool where carbon remains stored and not contributing to net greenhouse gas emissions (USDA-FS 2015). Harvested wood products from project activities would sequester carbon, and the project area would continue to sequester carbon as new growth becomes established. This would help offset any greenhouse gas emissions that may occur in the project area and elsewhere in the Allegheny National Forest. Proposed activities are within the scope of the current Forest Plan. Under the Forest Plan, the cumulative effects of management activities and projects thus far have resulted in an increasing trend in carbon sequestration on the Allegheny National Forest, as indicated by the report completed in 2015(USDA-FS 2015). Additional detailed cumulative analysis at the project level is unlikely to alter or enhance the outcome of this report. Potential effects of proposed activities on climate change are very small as indicated by its potential annual contribution to forest-wide greenhouse gas emissions.

As noted in the scoping proposal, the Forest Adaptation Resources Workbook (Swanston and others 2016) was used to consider the impacts of climate change on the Otter project. The interdisciplinary team used the workbook to consider a variety of adaptation actions that may be needed within the project area. The interdisciplinary team concluded that the actions associated with purpose and need for the project, as well as those required by the Forest Plan, already provide necessary adaptation needs. For example, proposed vegetation management would promotes resistance to extreme weather (i.e., wind, drought) and insect and disease outbreaks. Healthy forests are more resilient to changing conditions and more resistant to disease, pests, fire, and extreme weather. These stresses are likely to increase with climate change. Adaptation actions are also addressed through project design features and Forest Plan standards and guidelines. Examples include the protection and enhancement of habitat of threatened and endangered species and Regional Forester sensitive species; non-native invasive species control; and restoration of native plant communities.

B. Non-Issues: Comments, Questions, and Information Requests

Non-issues are comments that do not identify a dispute with the proposed action based on an anticipated effect. Non-issues also include opinions, comments on the National Environmental Policy Act (NEPA) process used, and requests for further information or other documents. They are presented verbatim or summarized as appropriate.

Non-issue 1

Being a retired USFS employee I know most USFS line-officers don't seriously consider or evaluate project changes suggested by the public because they selected the alternative that will be implemented prior to scoping. They feel the NEPA process is a needless, expensive waste of time. **(Artley)**

***Response:** We give meaningful consideration to all comments we receive. District Ranger Fallon is a former planner and environmental coordinator for a national forest, and he is committed to the NEPA*

process and all it embodies. He highly values public input, the consideration and development of alternatives, and the analysis of social, economic and environmental effects that are critical to making informed and appropriate decisions regarding activities on the Marienville Ranger District. Your comments, even when they reference the Line Officer personally, are important to our understanding of the issues that are of concern to the public, and they have received every consideration in our interdisciplinary discussions regarding project design and effects for the Otter project. And they will receive equal consideration in Ranger Fallon's decision for the Otter project.

Non-issue 2
Please alert me when the DEIS or pre-decisional EA is posted online and you are accepting comments. **(Artley)**

Response: *You will be notified when the Otter Environmental Assessment is posted online and when we are accepting comments.*

Non-issue 3
I ask that you make major changes in the Proposed Action described in the scoping document to assure the natural resources in and downstream from the sale area will not be harmed in any way. This includes "short-term" harm the agency so often accepts. **(Artley)**

Response: *Comment noted. Effects of the proposed action and any alternatives were analyzed and considered in the environmental assessment.*

Non-issue 4
Finally, USFS employees who are not afraid to think outside the agency box, should read this November 22, 2018 *Counterpunch* article that explains why profit for resource extraction corporations has driven the USFS's forest management policy for many decades.

https://www.counterpunch.org/2018/11/22/industrial-forest-science-industrys-bitch/ **(Artley)**

Response: *The Counterpunch article provides one perspective on the role of science and on seminal events in the recent history and evolution of forest management in Minnesota and Wisconsin. While thought provoking, it is by no means a definitive version of events, nor does it acknowledge the mission of the Forest Service, which includes the wise* ***use*** *of natural resources, of which the renewable products and benefits provided by trees is of primary importance. The purpose and need for this project is stated in detail in both the scoping proposal and the environmental assessment. The effects of timber harvesting and other proposed activities are analyzed and considered in the environmental assessment.*

Non-issue 5
I would like to say I very much appreciated the comprehensive and clearly written Scoping Document. **(Steinmeyer)**

Response: *Thank you.*

Non-issue 6
I would like to say I was very pleased to find a serious focus on improving soil and water quality within the project area, and the proposal for aggressive steps to remediate the deficits identified as not meeting the Commonwealth's water quality standards. **(Steinmeyer)**

Response: *Thank you.*

Non-issue 7
I do, however, have some issues concerning the proposed temporary openings greater than 40 acres in this project. There appears to be a number of inaccuracies and inconsistencies relating to the actual number of

blocks in the project with openings greater than 40 acres and the total picture of the openings identified on Map 2 and Map 6 **(Steinmeyer)**.

Response: *Thank you for finding and communicating the inaccuracies. Tables submitted in the comment were reformatted (below) to address the commenter's concerns and questions.*

Compartment 870					
Stand	**Acres**	**Map 2**	**Map 6**	**Table of Temporary Blocks**	**Notes**
005	23	Yes	?	Yes	Not delineated on Map 6
038	15	Yes	?	Yes	Not delineated on Map 6
080	10	Yes	?	Yes	Not delineated on Map 6

Response: *These three stands (870005, 870038, and 870080) are shown on Map 6 as Block 385B and outlined in yellow on Map 6.*

Compartment 886					
Stand	**Acres**	**Map 2**	**Map 6**	**Table of Temporary Blocks**	**Notes**
026	32	Yes	?	No	Proposed for silvicultural treatment
027	23	Yes	?	No	Proposed for silvicultural treatment

Response: *These two stands (886026 and 886027) are shown on Map 6 as Block 135C South and outlined in purple on Map 6. They are also listed in the table of temporary openings in the scoping proposal that was sent out to interested parties (second row in the table).*

Compartment 886					
Stand	**Acres**	**Map 2**	**Map 6**	**Table of Temporary Blocks**	**Notes**
020	46	Yes	?	No	Proposed for silvicultural treatment

Response: *This stand (886020) (46 acres in size) was inadvertently left off of Map 6 and was not included in the table of temporary blocks as a temporary opening greater than 40 acres in size. This stand will be added to Map 6 and the appropriate tables in the environmental assessment.*

Compartment 897					
Stand	**Acres**	**Map 2**	**Map 6**	**Table of Temporary Blocks**	**Notes**
016	16	Yes	?	No	Proposed for silvicultural treatment
038	38	Yes	?	No	Proposed for silvicultural treatment

Response: *These two stands (897016 and 897038) (together 54 acres in size) were inadvertently left off of Map 6 and were not included in the table of temporary blocks as a temporary opening greater than 40 acres in size. These stands will be added to Map 6 and appropriate tables in the environmental assessment.*

Compartment 871					
064	34	No	Yes	Yes	Proposed for silvicultural treatment
099	10	No	Yes	Yes	Proposed for silvicultural treatment

Response: *Prior to scoping, stand 871064 was split into two stands (871064 and 871099) as shown on Map 2. However, this was not carried over to Map 6, which shows stand 871064 prior to it being split into two stands. This will be corrected on Map 6 in the environmental assessment.*

Non-issue 8

In order to have a clear picture of exactly how many block of openings over 40 acres in size, Map 2 needs to show all stand that are going to receive silvicultural treatment including those previously approved but are in the project area **(Steinmeyer)**.

Compartment 870					
Stand	**Acres**	**Map 2**	**Map 6**	**Table of Temporary Blocks**	**Notes**
[006]	28	No	Yes	Yes	Previously approved. Not cut yet
[045]	36	No	Yes	Yes	Previously approved. Not cut yet
O45	?	No	Yes	Yes	Previously approved. Not cut yet
Compartment 865					
[006]	15	No	Yes	No	Previously approved. Recently cut
Compartment 871					
[018]	14	No	Yes	Yes	Previously approved. Not cut yet
[108]	21	No	Yes	Yes	Previously approved. Not cut yet
[008]	13	No	Yes	Yes	Previously approved. Not cut yet
[045]	6	No	Yes	Yes	Previously approved. Not cut yet
[046]	21	No	Yes	Yes	Previously approved. Not cut yet
[063]	14	No	Yes	Yes	Previously approved. Not cut yet
[092]	9	No	Yes	Yes	Previously approved. Not cut yet
[096]	6	No	Yes	Yes	Previously approved. Not cut yet

Response: *Map 2 in the scoping proposal was intended to show only those stands that are being proposed for silvicultural treatment in the Otter project. Map 6 shows the potential temporary openings greater in 40 acres in size that may result from recent (within the past 10 years) timber harvests, approved harvest that have not been cut yet, and proposed timber harvests in the Otter project. We have included the acres for the stands listed in the comment letter in the above table. Previously approved timber harvests will be discussed and disclosed in the environmental analysis, where appropriate, but not added to Map 2 in the environmental assessment as we believe that would be more confusing.*

The stands in the table below have had a regeneration harvest within the past 20 years within the project area.

Stand	Acres	Year of origin
865067	19	2012
866045	43	2010
871017	14	2006
871018	14	2013
871068	4	2012
871101	16	2016
882091	10	2014

The stands in the table below have been approved in previous decisions for a regeneration harvest within the project area, but the regeneration harvest has not occurred yet.

Stand	Acres	Anticipated year of regeneration harvest
866006	32	2020
871006	5	2020
871008	13	2020
871045	6	2022
871046	21	2020
871051	18	2020
871063	14	2023
871066	34	2020
871092	9	2020
871096	10	2020
882036	18	2020

Non-issue 9

My reading of the Otter Vegetative Management Project proposal suggests Map 6 needs to be amended to include the above indicated stands and the table of Temporary blocks over 40 acres needs to assign a site number to the blocks and add the additional acreages. This will increase the number of blocks with openings over 40 acres by four (4) and increase the total acreage by one hundred seventy one (171) acres bringing the actual total acreage being proposed for harvesting that will leave blocks of greater than 40 acres in size to 1,535 acres **(Steinmeyer)**.

Response: *Thank you again for noting these inaccuracies and for your suggestions to improve our analysis, request for comments, and ultimately the implementation of those aspects of the proposed action that are included in the decision. As noted above, corrections will be made to Map 6 for the environmental assessment. Temporary opening block 237F touches temporary opening block 4 (171 acres) from the Pine Bear Supplemental Environmental Assessment project and two additional temporary opening blocks called 237 South (89 acres) and 170 North (71 acres) were inadvertently left off of Map 6. Block 237 South includes a stand from the Pine Bear Supplemental Environmental Assessment project. With these corrections, there will be 14 blocks of temporary openings over 40 acres in size within the Otter project area totaling 1,795 acres from the proposed timber harvests and previously approved timber harvests.*

Non-issue 10

According to the 2003 FWRAP, an unroaded area is without the presence of a ***classified*** road. The OGM access roads are not necessarily classified roads. While these roads may take away from the wild nature of an area, they are generally of low disturbance and see only occasional traffic. It would appear to me that the boundaries of the Bloody Run unroaded area are defined by some roads that may or may not be classified. Further, some of these roads could be declassified **(Mauk)**.

Response: *Classified roads are defined as roads wholly or partially within or adjacent to National Forest System lands that are determined to be needed for long-term motor vehicle access, including State roads, county roads, privately owned roads (including oil and gas access roads), National System roads, and other roads authorized by the Forest Service. Unclassified roads are defined as roads on National Forest System lands that are not managed as part of the forest transportation system, such as unplanned roads, abandoned travelways, and off-road vehicle tracks that have not been designated and managed as a trail, and those roads that were once under permit or other authorization and were not decommissioned upon termination of the authorization.*

Roads characterized as classified roads were used to determine the boundaries of the unroaded areas in the 2003 Forest-wide Roads Analysis Process. Since the proposed road construction extends or realigns existing Forest Roads that are currently managed as closed, opportunities for solitude would still be

provided following implementation of proposed road construction and realignment. See response to comment 2, as well.

Literature Cited

SERA 2011. Syracuse Environmental Research Associates, Inc. Durkin, P. R. Glyphosate - Human Health and Ecological Risk Assessment, Final Report. SERA TR 052-22-03b. Report dated March 25, 2011.

Swanston, Christopher W.; Janowiak, Maria K.; Brandt, Leslie A.; Butler, Patricia R.; Handler, Stephen D.; Shannon, P. Danielle; Derby Lewis, Abigail; Hall, Kimberly; Fahey, Robert T.; Scott, Lydia; Kerber, Angela; Miesbauer, Jason W.; Darling, Lindsay. 2016. **Forest Adaptation Resources: climate change tools and approaches for land managers, 2nd ed.** Gen. Tech. Rep. NRS-GTR-87-2. Newtown Square, PA: U.S. Department of Agriculture, Forest Service, Northern Research Station. 161 p. http://dx.doi.org/10.2737/NRS-GTR-87-2

USDA-Forest Service. 2007. Allegheny National Forest Land and Resource Management Plan and Record of Decision. Warren, PA.

USDA-Forest Service. 2015. Baseline estimates of carbon stock in forests and harvested wood products for National Forest System Units, Eastern Region. March 6, 2015. 58 pp.